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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

June 7, 1993

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

**RE: DOCKET NO. 93-48, POLICIES AND RULES CONCERNING CHILDREN'S
TELEVISION PROGRAMMING**

REPLY COMMENTS

The American Psychological Association hereby submits the accompanying reply comments for the consideration of the Commission.

The comments specifically address statements made in the earlier comments submitted by the Fox Children's Network, as well as others, regarding the appropriateness of standard length versus short segment programming in meeting licensees' educational and informational programming obligations under the Children's Television Act of 1990.

Please feel free to contact me if any member of the Commission or its staff wishes clarification or elaboration on any point raised within these comments. I can be reached at (202) 336-5931.

Sincerely,

Brian L. Wilcox, Ph.D.
Director,
Public Policy Office

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
) MM Docket No. 93-48
Policies and Rules Concerning)
Children's Television Programming)
)
Revision of Programming Policies)
for Television Broadcast Stations)

**Reply Comments of
THE AMERICAN PSYCHOLOGICAL ASSOCIATION**

Introduction

The American Psychological Association (APA) is the largest organization of psychologists in the world, representing 118,000 researchers and practitioners. The purpose of the APA is to advance psychology as a science, a profession, and as a means of promoting human welfare. Many members of the APA conduct research which is directly relevant to the current proceeding, and the purpose of these comments is to summarize the findings from an extensive body of theory and research related to one of the issues raised by some members of the broadcast industry: children's attentional abilities and the implications of this research to the question of optimal program length.

Children's Attention and Children's Cognitive Abilities

In their comments to the Commission in response to the present Notice of Inquiry, several members of the television community, most notably Fox Children's Network, implied

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or explicitly stated that short segment programming should be generally accepted as a significant and major contribution to meeting a licensee's children's educational programming obligation because of (1) children's limited cognitive abilities and (2) children's limited attention spans. Short-segments, according to Fox, "which grab children's attention immediately and hold it briefly, have been shown to be a much more effective didactic tool for the electronic media."¹ Later, Fox alludes to (but fails to cite) "current research" substantiating their view that short segment programming is superior to standard length programming.²

These unsupported claims are inconsistent with our knowledge of children's developing cognitive abilities, generally, and with the findings from many studies of children's attention to and comprehension of television programming. The following comments will summarize some of the most pertinent bodies of empirical research.

Over the past decade, basic research on cognitive development has led to significant revisions in our assessment of the general and specific cognitive competencies of children.³ Infants and young children, in particular, are not nearly as incompetent as commonly believed. Instead, modern developmental psychology paints a picture of the young child as a

¹Comments of Fox Children's Network, Docket No. 93-49, p. 5.

²Comments of Fox Children's Network, Docket No. 93-48, p. 7.

³Flavell, J.H. (1992). Cognitive development: Past, present, and future. Developmental Psychology, 28, 998-1105.

self-motivated knowledge-seeker, a constructive thinker, and not a passive tabula rasa.⁴

Indeed,

The recent trend in the field has been to highlight the cognitive competencies of young children..., the cognitive shortcomings of adults, and the cognitive inconsistencies of both, effectively pushing from both ends of childhood toward the middle and blurring the difference between the groups.⁵

This is not to suggest that children are the cognitive equals of adults, or that young children's cognitive competencies are fully developed. Rather, contemporary research on children's mental abilities indicates that we have typically underestimated these abilities of children, and it certainly appears from the comments of broadcasters, particularly Fox, that the television industry has been generally guilty of such underestimation. The APA has argued in several filings before the Commission that the FCC should consider separate programming requirements for preschool and school-aged children to capitalize on the differing abilities, learning styles, and interests of children. As will be shown below, doing so does not require the use of short segment programming; it requires the proper tailoring of the content to target the audience's particular cognitive capacities and needs, a lesson well

⁴Gelman, R., & Brown, A.L. (1986). Changing views of cognitive competence in the young. In N.J. Smelser & D.R. Gerstein (Eds.), Behavioral and social sciences: Fifty years of discovery (pp. 175-207). Washington, DC: National Academy Press.

⁵Flavell, J.H. (1985). Cognitive development (2nd ed.). Englewood Cliffs, NJ: Prentice-Hall, p. 84. See Siegler, R.S. (1991). Children's thinking (2nd ed.). Englewood Cliffs, NJ: Prentice-Hall, for a similar analysis of the growing appreciation for children's cognitive abilities. It is not that children have become more competent in recent years; rather, developmental psychologists have become more competent at uncovering the abilities of children using a variety of new research methodologies.

understood by Children's Television Workshop and other producers of quality educational programming.

As noted earlier, Fox implies in their comments that "current research" supports the need for short segment programming for children. This is a considerable misrepresentation of the facts, and the Commission should note that Fox provided no support for this claim other than a vague reference to the interpretations of an advisory board which contained not a single developmental psychologist or communications researcher.

It is true that infants occasionally gaze at a television, and that the duration of their attention is quite brief,⁶ but it is also true that visual attention develops rapidly during the preschool years, up to about age 5, and actually drops off during middle childhood.⁷ Children's attention to television is quite variable, but then, so too is adults' attention. Numerous studies indicate that both children and adults look at and look away from the television screen frequently, and that after about age 6 the differences between the attentional

⁶Hollenbach, A. & Slaby, R. (1979). Infant visual response to television. Child Development, 50, 41-45.

⁷Anderson, D., Lorch, E., Field, D., Collins, P., & Nathan, J. (1986). Television viewing at home: Age trends in visual attention and time with television. Child Development, 57, 1024-1033; Anderson, D.R. & Collins, P.A. (1988). The impact on children's education: Television's influence on cognitive development (Working paper #2). Washington, DC: U.S. Department of Education, Office of Educational Research and Improvement; Anderson, D.R. (1992). Television and attention. In Television and the preparation of the mind for learning: Conference Proceedings (pp. 57-65). Washington, DC: U.S. Department of Health and Human Services, Administration for Children and Families.

behavior of children and adults is trivial.⁸ Research also clearly indicates that even preschool children are capable of maintaining extended attention to television.⁹

The common misconception that children are for some reason unable to sustain attention to television programming, a misconception clearly exemplified by Fox's comments, is most likely based on the fact that much of the programming we observe children viewing is intended for adults and is not easily comprehended by children.¹⁰ Children, like adults, will not long attend to something they don't understand. Thus, patterns of limited attention are associated principally with content that is inappropriate given the child's level of cognitive development. Numerous studies suggest that the most powerful predictor of increased attentional duration is the comprehensibility of the programming: material that challenges but does not outstrip the child's information processing capabilities will result in extended attention and greater levels of learning.¹¹ Children, it should be noted, think actively about

⁸Anderson, D.R. & Burns, J. (1991). Paying attention to television. In D. Zillmann & J. Bryant (Eds.), Responding to the screen: Perception and reaction processes (pp. 3-26). Hillsdale, NJ: Erlbaum.

⁹See Anderson, D., et al. (1986).

¹⁰This criticism also holds for some programming intended for children. All too often, writers and producers are ill-informed about the specific cognitive abilities of their target audience and how those abilities can best be tapped. See Collins, W.A. (1983). Interpretation and inference in children's television viewing. In J. Bryant & D.R. Anderson (Eds.), Children's understanding of television: Research on attention and comprehension (pp. 125-150). New York: Academic Press.

¹¹Anderson, D.R., & Lorch, E. (1983). Looking at television: Action or reaction? In J. Bryant & D.R. Anderson (Eds.), Children's understanding of television: Research on attention and comprehension (pp. 1-33). New York: Academic Press; Collins, W.A. (1982). Cognitive processing in television viewing. In D. Pearl, L. Bouthilet, & J. Lazar (Eds.),

